26

RENE L. VALLADARES Federal Public Defender Nevada State Bar No. 11479 JOY CHEN Assistant Federal Public Defender 411 E. Bonneville, Ste. 250 Las Vegas, Nevada 89101 (702) 388-6577/Phone (702) 388-6261/Fax Joy Chen@fd.org

Attorney for Thomas Eric Conmy

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS ERIC CONMY,

Defendant.

Case No. 2:05-cr-00083-KJD-GWF-1

**Stipulation to Continue Response to** Supplement's Deadline to Motion for **Compassionate Release** 

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen, Assistant Federal Public Defender, counsel for Thomas Eric Conmy, request that the due date for the Defendant and Government's Response to Supplement to Motion for Compassionate Release (ECF No. 170), be extended from January 31, 2024, to February 14, 2024...

This Stipulation is entered into for the following reasons:

- 1. Defense counsel is set for trial in USA v. Jenkins (2:24-mj-00002-EJY) on February 5, 2024.
- 2. The government has raised a novel constitutional argument in its supplement. Defense counsel requires additional time to respond to this argument.

Defendant is in custody and does not oppose the continuance. 3. 4. The parties agree to the continuance This is the first request for a continuance of the response to supplement deadline. DATED this 29th day of January 2024. RENE L. VALLADARES Federal Public Defender JASON M. FRIERSON United States Attorney By <u>/s/ Joy Chen</u> JOY CHEN By /s/ Jim W. Fang JIM W. FANG Assistant Federal Public Defender Assistant United States Attorney 

## 

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

ORDER

Case No. 2:05-cr-00083-KJD-GWF-1

Plaintiff,

v.

THOMAS ERIC CONMY,

Defendant.

IT IS THEREFORE ORDERED that upon consideration of this Request to Extend Deadline for filing the Response to Supplement to Motion for Compassionate Release, that the Defendant and Government's deadline to file the Response is extended to February 14, 2024.

DATED this 29 day of January 2024.

UNITED STATES DISTRICT JUDGE